

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION V

DATE: OCT 03 1991  
SUBJECT: Satralloy/Satra Concentrates  
FROM: *William E. Mund*  
William E. Mund, Associate Director *for*  
Office of RCRA, Waste Management Division  
TO: Norman R. Niedergang, Associate Director  
Office of Superfund, Waste Management Division

This memorandum constitutes a referral of the above referenced facility to the Office of Superfund for appropriate action. Satralloy/Satra Concentrates located in Steubenville, Ohio, is storing previously de-listed, or excluded "Bevill" wastes (specifically K090 and K091) in a wastepile on site.

In response to a court ruling regarding these types of wastes, and a determination that these wastes were not subject to this exclusion, the wastes were proposed for re-listing in a September 13, 1988, Federal Register. The listings became effective on March 13, 1989. In Satralloy's case however, it has been determined that the facility has not newly generated, or managed this waste since the effective date of March 13, 1989. The waste in this wastepile was deposited more than six years prior to the listing; therefore, this unit is not effected by the re-listing and is not "RCRA-regulated". (See 54 Fed. Reg. 15316, 15338, April 17, 1989).

Although this is the case, both the Ohio Environmental Protection Agency (OEPA) and the RCRA Enforcement Branch, are concerned due to unrestricted access to this pile. OEPA inspectors (Mike Moschell OEPA-SEDO) have indicated that children play on the pile often, and that it is used as a dirt bike and go-cart track. The main constituent of concern in this waste is chromium.

We have attached additional background information to assist you in your response. If there are any questions, please call Kim Ogle at 6-1478.

EPA Region 5 Records Ctr.



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